

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:	)	
	)	
	)	PROMESA
THE FINANCIAL OVERSIGHT AND	)	Title III
MANAGEMENT BOARD FOR PUERTO RICO,	)	
as representative of	)	Case No. 3:17-bk-03283 (LTS)
	)	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	)	
Debtors.	)	

In re:	X	
	)	
	)	
	)	PROMESA
THE FINANCIAL OVERSIGHT AND	)	Title III
MANAGEMENT BOARD FOR PUERTO RICO	)	
as representative of	)	Case No. 3:17-cv-01685 (LTS)
	)	Case No. 3:17-bk-03566 (LTS)
	)	
THE EMPLOYEES RETIREMENT SYSTEM OF THE	)	
GOVERNMENT OF THE COMMONWEALTH OF	)	
PUERTO RICO,	)	
Debtor.	)	

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**URGENT MOTION OF CERTAIN SECURED CREDITORS OF THE EMPLOYEES  
RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO TO FILE UNDER SEAL UNREDACTED EXPERT REPORTS**

To the Honorable United States District Court Judge Laura Swain:

1. In connection with the *Supplemental Brief in Support of Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay* [Docket No. 7564 in Case No. 17-bk-03283 and Docket No. 583 in Case No. 17-bk-03566], the *Declaration of Sparkle L. Sooknanan in Support of Supplemental Brief in Support of Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay* [Docket No. 7561 in Case No. 17-bk-03283 and Docket No. 578 in Case No. 17-bk-03566] (the “Sooknanan Declaration”) and the *Notice of Filing List of Declarations and Exhibits* [Docket No. 7556 in Case No. 17-bk-03283 and Docket No. 575 in Case No. 17-bk-03566] (the “Notice of Filing”), the Bondholders<sup>1</sup> file this urgent motion to seal in accordance with the provisions of the *Stipulation and Order for the Production and Exchange of Confidential Information* [Docket No. 60 in Case No. 17-ap-00213] (the “Confidentiality Order”).

2. The Bondholders marked the Expert Report of Faten Sabry, Ph.D., dated May 30, 2019, and the Rebuttal Expert Report of Faten Sabry, Ph.D., dated June 12, 2019, (together the “Expert Reports”) as “confidential” under the Confidentiality Order because they cited to and relied on documents that the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Commonwealth of Puerto Rico, the Puerto Rico Fiscal Agency

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<sup>1</sup> Bondholders include Andalusian Global Designated Activity Company, Glendon Opportunities Fund, L.P., Mason Capital Master Fund L.P., Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Ocher Rose, L.L.C., Puerto Rico AAA Portfolio Bond Fund, Inc., Puerto Rico AAA Portfolio Bond Fund II, Inc., Puerto Rico AAA Portfolio Target Maturity Fund, Inc., Puerto Rico Fixed Income Fund, Inc., Puerto Rico Fixed Income Fund II, Inc., Puerto Rico Fixed Income Fund III, Inc., Puerto Rico Fixed Income Fund IV, Inc., Puerto Rico Fixed Income Fund V, Inc., Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc., Puerto Rico Investors Bond Fund I, Puerto Rico Investors Tax-Free Fund, Inc., Puerto Rico Investors Tax-Free Fund, Inc. II, Puerto Rico Investors Tax-Free Fund III, Inc., Puerto Rico Investors Tax-Free Fund IV, Inc., Puerto Rico Investors Tax-Free Fund V, Inc., Puerto Rico Investors Tax-Free Fund VI, Inc., Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc., SV Credit, L.P., Tax-Free Puerto Rico Fund, Inc., Tax-Free Puerto Rico Fund II, Inc., and Tax-Free Puerto Rico Target Maturity Fund, Inc.

and Financial Advisory Authority, and the Financial Oversight and Management Board for Puerto Rico (collectively, “Respondents”) designated as “confidential.”

3. Redacted versions of the Expert Reports were filed as exhibits to the Sooknanan Declaration and the *Declaration of Faten Sabry in Connection with Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay* [Docket No. 7556-2 in Case No. 17-bk-03283 and Docket No. 575-2 in Case No. 17-bk-03566], which was filed with the Notice of Filing.

4. The Bondholders have communicated with counsel for Respondents and they requested that the Bondholders continue to designate as “confidential” any portions of the Expert Reports that directly quote from documents designated as “confidential.”

5. The Bondholders respectfully request that the Court grant this Urgent Motion allowing them to file the unredacted Expert Reports under seal.

6. The Bondholders hereby certify that they have made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court. Because counsel for Respondents requested that the Bondholders continue to designate as “confidential” any portions of the Expert Reports that directly quote from documents designated as “confidential,” the Bondholders do not expect that Respondents will oppose this Urgent Motion.

In San Juan, Puerto Rico, today June 24, 2019.

By:

/s/ Alfredo Fernández-Martínez

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